

BLESSING GREENHOUSES AND COMPOST FACILITY, INC.
Corrective Action Plan
Status Update July 15, 2022

1. Sediment and Stormwater Plan Notice of Intent Submittal: **Completed**

The revised Sediment and Stormwater Plan, dated November 22, 2021 was submitted to the Sussex Conservation District along with the signed Temporary Construction Easement. The Notice of Intent was submitted and received on December 19, 2021. In an email dated December 21, 2021, DNREC notified the facility that of confirmation that "The Notice of Intent (NOI) for Storm Water Discharges Associated with Construction Activity under a NPDES General Permit" was processed and the NOI number is 6603. In an email dated December 21, 2021, the Sussex Conservation District requested clarification regarding identified easements. A response was provided.

An email notification dated December 21, 2021 notified the facility the NOI Form was approved and assigned No. 6603. In a letter dated January 14, 2022, Jessica Watson of the Sussex Conservation District notified the facility that the Conservation District found the Sediment and Stormwater Plan acceptable and requested copies of certified plans submitted along with payment for inspections. The letter is attached for reference.

2. Landscaping Plan: **Completed**

A copy of the Landscaping Plan was hand delivered to the Sussex County Planning and Zoning Office on May 10, 2021 by Mr. Tim Willard. The Plan was recently revised to address additional comments provided by the Planning and Zoning Office on April 4, 2022. The revised Plan was resubmitted on April 13, 2022.

3. Sussex County Planning and Zoning Office Meeting: Tim Willard met with Everett Moore, Esq., on April 28, 2021 to notify the County's legal department that the Preliminary Site Plan would be submitted the following week. A delay occurred with submission due to unexpected issues with the Landscaping Design Plan. Specifically, when the CAD file was converted to a PDF file, the integrity of the document was damaged, making the text illegible. The Blessing Greenhouses and Compost Facility received a new PDF document on May 5, 2021 and immediately ordered prints for submission. Electronic copies of all files were provided to Tim Willard on May 6, 2021. The Preliminary Site Plan, including the Landscaping Plan, was hand delivered by Tim Willard on May 10, 2021. A follow-up email was sent to the Sussex County Planning and Zoning Office on May 10, 2021 providing the following dropbox link, allowing access to electronic copies of submitted documents.
<https://www.dropbox.com/sh/hfy91lt9rxwnj5i/AABjlgzT78Xcu7X7v2PjH8eRa?dl=0>.

Copies of the Final Site Plan, Landscape Plan, approved NOI and Sediment and Erosion Control Plan were provided to the County during the week of January 31, 2022. Tim Willard has followed up with Sussex County to determine the timeframe for approval.

4. Building Design: Contract signed with Structor Engineering in December 2020 for the design of the building interior. The draft building design was received in March 2021. The design was reviewed and comments provided to the Engineering firm by March 30, 2021. The Fire Marshal was contacted in March 2021 to determine fire suppression requirements. On November 10, 2021 Structor Engineering provided preliminary drawings to Bruce Blessing for comment. The draft electrical drawings were finalized during the week of November 15, 2021 and provided to Bruce Blessing as well. Bruce Blessing shared the preliminary drawings with ClearSpan in an effort to coordinate the design of the building with the concrete design.

The structural design has undergone a major revision in an effort to meet the County's building height restriction of 42 feet. Subsequently, the foundation plans have also undergone revision to ensure the concrete specifications are sufficient to hold the weight of the compost material. The structural design along with the foundation plans should be completed in August 2022. Once finalized, the documents will be provided to the Fire Marshall for approval.

5. Preliminary Site Plan: **Completed.**

The Preliminary Site Plan was hand delivered on May 10, 2021 to the Planning and Zoning Office for review and approval as part of the Preliminary Site Plan process. The Preliminary Site Plan includes a new state-of-art compost building (compost activities including unloading of raw materials will occur under roof) and associated biofilter, stormwater best management practices to include submerged gravel wetlands and storm water conveyance systems, and a vegetative buffer prepared by a certified nursery professional.

Copies of the Final Site Plan, Landscape Plan, approved NOI and Sediment and Erosion Control Plan were provided to the County during the week of January 31, 2022. Tim Willard has followed up with Sussex County to determine the timeframe for approval.

6. Coastal Zone Application: A Coastal Zone Act Permit Application is required and will be prepared once details regarding composting operations (equipment and design) are finalized. A delay in the anticipated submission date (June 30, 2021) has occurred as the building design/equipment list has not been finalized. Anticipated to begin drafting the application package in January 2022.

The CZA cannot be prepared until building specifications and process designs are finalized. Anticipate to begin preparation of the the CZA in August 2022.

7. Environmental Permits: Appropriate Environmental Permits will be obtained once a Coastal Zone Act Permit is issued. As the need for environmental permits are identified, the CAP will be updated to identify the permit and application submission timeframe.

The Blessing Greenhouses team met with members of DNREC's Surface Water Discharges Section on March 11, 2022 to discuss future permitting requirements and provide a tour of the facility. Emission calculations performed as part of the CZA process will determine Air Permit applicability. Appropriate permit applications will be completed and submitted as required.

8. Final Site Plan: A Final Site Plan including all buildings, buffers, site improvements and a landscaping plan and stormwater management facilities will be completed and submitted to the Planning and Zoning Commission by December 31, 2022. It should be mentioned that the Blessing Greenhouses and Compost Facility anticipates submittal to occur well in advance of the December 31, 2022 deadline; with the construction of Phase 1 (compost building; submerged wetlands, vegetative berm) completed within 1 year of Final Site Plan approval. The timeframes identified within this document demonstrate the Facility's commitment to submitting and receiving approval of the Final Site Plan in an effort to complete construction of Phase 1 by Fall of 2022.

Copies of the Final Site Plan, Landscape Plan, approved NOI and Sediment and Erosion Control Plan were provided to the County during the week of January 31, 2022. Tim Willard has followed up with Sussex County to determine the timeframe for approval.

In a letter dated April 4, 2022, the Planning and Zoning Commission provided comments regarding the Preliminary Site Plan. The Blessing Greenhouses and Compost Facility addressed comments and provided a written response from Mr. Tim Willard on April 13, 2022. The April 13, 2022 response also requested final site approval conditioned on the satisfaction of comments and agency approvals. The Final Site Plan was presented as an agenda item on the Planning and Zoning Commission's April 14, 2022 meeting. No objections were received during the meeting. The Planning and Zoning Committee did require an exemption from the fire department be obtained and the right-of-way be clarified. The facility is addressing each item, which should be completed by August 15, 2022.

9. Stormwater Pollution Prevention Plan Revisions: The SWPPP will be revised to reflect facility modifications. This will be an ongoing process and DNREC will be notified and provided with each iteration of the document. The SWPPP was submitted

to DNREC and approved on January 21, 2021. DNREC's letter of approval was forwarded to the EPA on January 22, 2021. The Facility continues to implement and maintain all programs required by its GSWP. Monthly Routine Inspections will continue to be performed and the SWPPP updated as warranted. The Semi-Annual Comprehensive Site Evaluation and Annual Training was completed in December 2021.

The facility continues to implement and maintain all programs required by the SWPPP and will revise as necessarily to ensure the document reflects current site conditions.

10. Final Completion Date of all Work: The Blessing Greenhouses and Compost Facility anticipates construction of Phase 1 (including state-of-art building, vegetative berm, and submerged gravel wetlands) to be completed by Fall 2022. Originally, it was anticipated that construction of the vegetative berm and submerged wetlands would commence in the Fall 2021 and building construction would commence in Spring 2022. However, due to delay with finalizing the Sediment and Stormwater Plan, receiving the required Construction Permit and finalizing the building design, it appears that the vegetative berm and submerged wetland will not be constructed in the Fall 2021. Construction is dependent upon issuance of the Construction Permit. Once received, construction will begin immediately. In the interim, the Facility is researching plant vendors to supply required vegetation. Phase 1 Construction completion is still anticipated by Fall 2022.

Due to delays with building design and anticipated delays receiving construction material, it is now anticipated that the building (Phase 1) construction will be completed in Spring of 2023. Blessing Greenhouses is still waiting on approval from the County at this point. The facility is planning to install the stormwater management system (gravel wetlands) in the Fall of 2022 or Spring 2023 (dependent upon agency approvals) and install necessary plants to complete the Landscape Design in the Winter/Spring of 2023. The facility will source and store necessary plants during the Fall 2022.